

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

Secure Matrix LLC,

Plaintiff

v.

Santikos Real Estate Services, LLC,

Defendant.

Case No. 7:25-cv-00120-DC-DTG

Patent Case

Jury Trial Demanded

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND TO
DEFENDANT’S MOTION TO DISMISS**

1. Plaintiff Secure Matrix LLC (“Plaintiff”) seeks to extend the time to file its Response to the Motion to Dismiss filed by Defendant Santikos Real Estate Services, LLC (“Defendant”) on April 09, 2025, which is currently due on April 23, 2025, or otherwise file a first amended complaint, by 7 days to April 30, 2025.

2. This is Plaintiff’s first request for an extension of this nature.

3. The reason for this requested extension is to allow counsel for Plaintiff additional time to investigate the allegations set forth in Defendant’s Motion to Dismiss and consider an appropriate response.

4. Granting this request will not alter the date of any other event or deadline already fixed by Court order.

5. The parties have met and conferred, and Defendant does not oppose this Motion.

6. Plaintiff therefore respectfully requests that the Court grant this request to extend the deadline to file responsive brief to the Motion to Dismiss or otherwise file a first amended complaint by 7 days to April 30, 2025.

Dated: April 22, 2025

Respectfully submitted,

/s/ Isaac Rabicoff

Isaac Rabicoff

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Counsel for Plaintiff

Secure Matrix LLC

CERTIFICATE OF CONFERENCE

In compliance with Local Rule CV-7(i), counsel for Plaintiff and counsel for Defendant conferred regarding the motion for extension of time on April 22, 2025. Counsel for Defendant does not oppose this motion and the extension sought hereby.

/s/ Isaac Rabicoff
Isaac Rabicoff

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on April 22, 2025 via the Court's CM/ECF system.

/s/ Isaac Rabicoff
Isaac Rabicoff